

TITLE 326 AIR POLLUTION CONTROL BOARD

#05-118 (APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from September 1, 2005, through October 3, 2005, on IDEM's draft rule language.

IDEM received comments from the following parties:

Improving Kids' Environment (IKE)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: The proposal includes combined limits for several combinations of batteries in operation. A key challenge of combined limits is the increased difficulty in determining compliance. How will Citizens Gas & Coke Utility (CG & CU) assess compliance on an ongoing basis and provide documentation of that compliance? How will IDEM evaluate compliance on an ongoing basis? Will IDEM include language in the rule or other enforceable mechanism, such as the facility's permit, that specifies the compliance method? (IKE)

Response: To determine compliance, CG & CU currently measures the hydrogen sulfide content of the coke oven gas on a daily basis. The sample is taken after the coke oven gas is desulfurized by the iron oxide boxes. The draft Title V permit for the facility includes metering the fuel gas that is combusted in each battery and measuring the sulfur content that is present in the coke oven gas. IDEM is proposing to amend the rule to require fuel sampling and analysis on a daily basis.

Comment: The combined limit is equal to the sum of the current limits, whatever the combination of batteries in operation. If an appropriate method to assure compliance with a combined limit can be established, the commenter suggests that the company and IDEM consider limits that are lower than the sum of the existing limits. It appears from the company's recent emission statements that actual emissions may be consistently lower than what is allowed under the current rule. Given that Marion County has been designated as nonattainment for fine particle pollution, to which SO₂ contributes, it would seem prudent to adjust the emissions permitted in the rule to reflect realistic operations at the facility. (IKE)

Response: The combined limit for all batteries in operation is seventy-eight and two-hundredths (78.02) pounds per hour which is three hundred forty-two (342) tons per year. From 1999 to 2003, the company's actual SO₂ emissions have ranged from one hundred eighty-seven (187) to three hundred fifty-two (352) tons/yr. While for most years the actual emissions have been less than allowed, there is enough variation in the emissions from year to year that lowering the combined limit may cause concern for meeting the combined limit in future years.